

## **REMARKS**

### **I. Status of Claims**

Claims 1-25 are pending in this application. By this Amendment, claims 1, 8, 11, 16, and 22 have been amended. In view of the above amendments and the following remarks, reconsideration and prompt early allowance are respectfully requested.

### **II. Rejection under 35 U.S.C. §102(e)**

Claims 1-5, 11, 12, 15-17, 19, 22 and 23 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No 6,285,785 to Bellegarda *et al* (hereinafter "Bellegarda"). This rejection is respectfully traversed.

Bellegarda discloses a system for accepting and interpreting both handwriting and speech input. Bellegarda allows input through an Integrated Speech and Writing Interface (ISWI) 18. As illustrated in FIG. 1 and FIG. 2, Bellegarda discloses a series of components that variously operating during a training phase and during a decoding phase. For example, in FIG. 1, handwriting model trainer 28 and speech model trainer 30 operate during the training phase to determine a set of optimal parameters for the handwriting word model 32 and the speech word model 34. The model trainers 28, 30 also determine optimal weights that govern the relative contribution of speech and handwriting to final message recognition. Language models 36a and 38a discard unlikely strings. These tasks are performed during a training phase which trains the system to operate before use in actual input decoding. During actual decoding, after training, likelihood estimators, and additional components perform scaling and likelihood merging to decode a message.

In contrast to the system of claim 1, Bellegarda fails to disclose a pre-processing mode in which a handler having a first language model interacts with a language model service having a

second language model. The two language models are distinct and the handler selects appropriate text after considering its own first language model and suggestions from the language model service that are based on the second language model. Specifically, Bellegarda fails to disclose the language model service designed to receive a range within a document from a handler and in response provide to the handler advice regarding text under consideration by the handler to insert within the document at the range, wherein the handler relies on a first language model for determining text entry and the language model service relies on a second language model distinct from the first language model.

The Office Action identifies components 12, 24, and 26 (FIGs. 1 and 2 of Bellegarda) as handlers. None of these components is capable of implementing a language model that is distinct from the language model of the language model service to recognize text as required by claim 1. Furthermore, Bellegarda fails to disclose that the handler determines and enters text in order to create the document after considering conclusions of the first language model and the second language model.

Furthermore as set forth in claim 1, the pre-processing mode is a text entry mode that causes text to be entered into a document. In contrast, the training mode of Bellegarda is not a text entry mode.

Additionally, Bellegarda fails to disclose any type of correction mode. The decoding mode of Bellegarda recognizes text, but does not correct text already contained within a document as required by claim 1. Finally, claim 1 defines two modes, the pre-processing and the correction mode, in which a different component ultimately determines text entry in each mode. In the pre-processing mode, the handler makes the determination and in the correction mode, the language model service makes the determination. Bellegarda fails to disclose this feature.

Because Bellegarda fails to disclose each and every feature of claim 1, Bellegarda fails to anticipate claim 1. Claims 2-5 depend from claim 1 therefore define over the art of record for at least the reasons set forth above with respect to claim 1.

With regard to independent claim 11, a method is provided for facilitating entry of text into a document. The method includes generating by the language model service advice regarding text under consideration by the handler to insert within the document at the range. The language model service implements a context-based language model distinct from a language model utilized internally by the handler. As set forth above, the items of Bellegarda listed as handlers in the Office Action do not have an internal language model capable of interpreting handwriting or speech data. Bellegarda further fails to disclose providing by the language model service the advice to the handler for consideration by the handler in creation of the document.

Claims 12 and 15 depend from claim 11 and therefore define over the art of record for at least the reasons set forth above with regard to claim 11.

With regard to independent claim 16, Bellegarda fails to disclose a computer-implemented method for correction as claimed. Bellegarda discloses a training mode and a decoding mode, but no correction mode. Specifically, Bellegarda fails to disclose a language model service implementing a first language model that seeks correction suggestions from a plurality of handlers in a correction mode of operation in which a number of different handlers for a number of different input devices were initially responsible for insertion of the text. Furthermore, Bellegarda fails to disclose each handler implementing a language model distinct from the first language model implemented by the language model service. Furthermore, Bellegarda fails to disclose determining corrections to the text by the language model service

after considering both the first language model and the suggestions received from the different handlers.

Claims 17 and 19 depend from claim 16 and define over the art of record for at least the reasons set forth above with respect to claim 16.

With regard to independent claim 22, Bellegarda fails to disclose at least the features as set forth above with regard to independent claim 1. These features are all contained within claim 22. Claim 23 depends from claim 22 and is allowable over the art of record for at least the reasons set forth above with respect to independent claim 22.

Because Bellegarda fails to disclose each and every feature of claims 1-5, 11, 12, 15-17, 19, 22, and 23 Bellegarda fails to anticipate these claims. Withdrawal of the rejection is therefore respectfully requested.

### **III. Rejection under 35 U.S.C. §103(a)**

Claims 6-10, 13, 14, 18, 20, 21, 24 and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Bellegarda in view of U.S. Patent No. 6,308,187 DeStefano *et al.* (hereinafter "DeStefano"). This rejection is respectfully traversed.

In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686,688 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

Independent claims 8 and 16 include the features of independent claims 1 and 11 as discussed above. DeStefano fails to obviate the above-noted deficiencies of Bellegarda.

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Accordingly, even if combined, the references would not have resulted in the invention of claims 8 and 16.

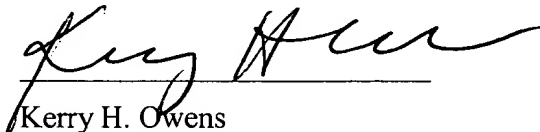
Claims 6 and 7 depend from claim 1. Claims 13 and 14 depend from claim 11. Claims 18, 20, and 21 depend from claim 16 and claims 24 and 25 depend from claim 22. These dependent claims define over the art of record for at least the reasons set forth above with respect to the corresponding independent claims. Accordingly, the references fail to render the claims obvious. Withdrawal of the rejection under 35 U.S.C. §103 is therefore respectfully requested.

#### **IV. Conclusion**

Applicants respectfully submit that the rejections have been overcome and claims 1-25 are now believed to be in condition for allowance. Allowance of all pending claims is respectfully requested. However, if the Examiner believes that any issues remain, he should feel free to contact the undersigned at the telephone number below. The Commissioner is hereby authorized to charge any additional fees that are required or credit any overpayment to Deposit Account No. 19-2112 referencing MFCP 87508.

Respectfully submitted,

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Kerry H. Owens  
Reg. No. 37,412

SHOOK, HARDY & BACON L.L.P.  
2555 Grand Blvd.  
Kansas City, Missouri 64108-2613  
Telephone (816) 474-6550  
Facsimile (816) 421-5547